REMARKS

Applicants appreciate the Examiner's thorough review of the present application, and respectfully request reconsideration in light of the preceding amendments and the following remarks.

Claims 1, 3-5, 7-14 and 16-22 are pending in the application. Claims 2, 6, and 15 have been cancelled without prejudice or disclaimer. Claims 1, 5, and 14 have been amended to include claims 2, 6, and 15, respectively. Claims 1, 5, 8, 9, 11, 12 and 14 have been further amended to improve claim language and/or better define the claimed invention. New claims 17-22 have been added to provide Applicants with the scope of protection to which they are believed entitled. The amended/new claims find solid support in the original application, especially the drawings. The Abstract has been revised to be compliant with commonly accepted US patent practice. No new matter has been introduced through the foregoing amendments.

The *35 U.S.C. 102(b)* rejections of all original claims as being anticipated by *Ayano* are noted. Applicants respectfully traverse at least the rejections of claims 2, 6, 8, 11 and 15.

With respect to claims 2, 6, and 15 which are now included in the respective independent claims, i.e., claims 1, 5, and 14, the applied reference fails to teach or disclose that "the connecting element includes a capacitor and a resistor connected in series." As can be seen in Figs. 1-4 and 8 of *Ayano*, the reference's common-mode current circulation line 7 includes no capacitor or resistor; it includes only an inductor in the portion that extends through GP coil 3.

The Examiner's reliance on capacitor 91 and resistor 92 in Figs. 9-13 of *Ayano* for the claimed feature is noted. Applicants respectfully submit that capacitor 91 and resistor 92 of *Ayano* are not readable on the claimed connecting element that connects a neutral point of the alternating current circuit to a reference potential point, as recited in the independent claims. According to the Examiner, *Ayano* teaches an alternating current circuit at motor 5 and a connecting element at line

7. As can be seen in Figs. 9-13 of *Ayano*, line 7 does <u>not</u> connect a neutral point of motor 5 to a reference potential point. The neutral point of motor 5 is at element 6 which, as illustrated in Figs. 9-13 of *Ayano*, is <u>not</u> connected by line 7 to the reference potential point.

Thus, *Ayano* does not anticipate amended claims 1, 5, and 14. The reference is not modifiable to include the above discussed claim feature, lacking an adequate suggestion or motivation to do so.   Accordingly, amended independent claims 1, 5, and 14 are patentable over *Ayano*.

With respect to independent claim 8, the applied reference fails to teach or disclose "a common mode choke connected to a <u>direct current</u> <u>input</u> terminal side of the power converter." With respect to independent claim 11, the applied reference fails to teach or disclose "a common mode choke connected to and between direct current output terminals of the first power converter and <u>direct current</u> <u>input</u> terminals of the second power converter." As can be seen in Figs. 1, 10 and 11 of *Ayano*, the reference's "common mode choke" 3 is connected to the <u>output</u> terminal side of power converter 2. In Figs. 8-9, the reference's "common mode choke" 33 is connected to the <u>alternating current</u> input terminals of power converter 2.

Thus, *Ayano* does not anticipate independent claims 8 and 11. The reference is not modifiable to include the above discussed claim feature, lacking an adequate suggestion or motivation to do so. Accordingly, independent claims 8 and 11 are patentable over *Ayano*.

The dependent claims are considered patentable at least for the reasons advanced with respect to the respective independent claims. The dependent claims are also patentable on their own merits since these claims recite other features neither disclosed, taught nor suggested by the applied art, as will be apparent to the Examiner upon reviewing these claims.

Specifically, the applied reference does not fairly teach or suggest the features of new claims 18-22. For example, as to claim 18, the *Ayano* line 7, contrary to the claim language,

extends through the common mode choke 3, as best seen in Figs. 2-3 of the reference.

As to claim 19, the *Ayano* line 7, contrary to the claim language, the connecting element has a portion that extends through and forms a part of the common mode choke 3, as best seen in Figs. 2-3 of the reference.

As to claim 20, the *Ayano* line 7, contrary to the claim language, the connecting element is not separated from the common mode choke 3, as best seen in Figs. 2-3 of the reference.

As to claim 21, the *Ayano* line 7, contrary to the claim language, the connecting element is not free of magnetic coupling to the common mode choke 3 due to the portion extending through choke 3, as best seen in Figs. 1-4 and 8-11 of the reference.

As to claim 22, the *Ayano* line 7, contrary to the claim language, the connecting element has a portion that extends through and forms a part of and is located inside the common mode choke 3, as best seen in Figs. 2-3 of the reference.

Each of the Examiner's rejections has been traversed/overcome. Accordingly, Applicants respectfully submit that all claims are now in condition for allowance. Early and favorable indication of allowance is courteously solicited.

The Examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

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